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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 JUDY DONATELL, individually; JUDY
DONATELL, as Special Administrator of
12 the Estate of ANGELA DAWN DONATELL,
deceased; JUDY DONATELL, as the Guardian
13 Ad Litem for X. M., a minor, under 14 years of
age,

14 Plaintiffs,

15 v.

16 THE CITY OF LAS VEGAS, a political
17 subdivision of the State of Nevada; *et al.*

18 Defendants.

Case No.: 2:15-cv-02334-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND PLAINTIFFS' RESPONSE
TO DEFENDANT CITY OF LAS
VEGAS' MOTION FOR SUMMARY
JUDGMENT [ECF 112] and
DEFENDANT CORRECT CARE
SOLUTIONS' MOTION FOR
SUMMARY JUDGMENT [ECF 113]**

19 COMES NOW, the above-referenced parties, by and through their undersigned counsel
20 of record, and hereby agree, jointly stipulate that the Plaintiffs' Response to Defendant City of
21 Las Vegas' Motion Summary Judgment, filed on August 24, 2017 [ECF 112], currently due
22 September 14, 2017, be extended an additional (30) thirty days up to and including Monday,
23 October 16, 2017, and Plaintiffs' Response to Defendant Correct Care Solutions' Motion for
24 Summary Judgment, filed on August 25, 2017 [ECF 113], currently due to September 15, 2017,
25 be extended an additional (30) thirty days up to and including Monday, October 16, 2017.

26 Although Plaintiffs' counsel has been actively working on responding to Defendants'
27 Motion, Plaintiffs' counsel has been unable to complete the Responses due to a medical
28 emergency.

1 This request for extension is made in good faith and not for the purposes of delay.

2 WHEREFORE, the parties respectfully request that Plaintiffs' Response to City of Las
3 Vegas' Motion for Summary Judgment and the Response to Correct Care Solutions' Motion for
4 Summary Judgment, be extended an additional (30) thirty days up to and including Monday,
5 October 16, 2017.

6 APPROVED AS TO FORM AND CONTENT.

7 Dated this 12th day of September, 2017.

8 POTTER LAW OFFICES

9 By /s/ C. J. Potter, IV, Esq.

10 Cal J. Potter, III, Esq.
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12 C.J. Potter, IV, Esq.
13 Nevada Bar No. 13225
14 1125 Shadow Lane
15 Las Vegas, Nevada 89102
16 *Attorneys for Plaintiffs*

Dated this 12th day of September, 2017.

LEWIS BRISBOIS BISGAARD & SMITH
LLP

By /s/ Amanda J. Brookhyser, Esq.

S. Brent Vogel, Esq.
Nevada Bar No. 6858
Amanda J. Brookhyser, Esq.
Nevada Bar No. 11526
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
*Attorneys for Defendant
Correct Care Solutions*

15 Dated this 12th day of September, 2017.

16 LAS VEGAS CITY ATTORNEY

17 By /s/ Philip R. Byrnes, Esq.

18 Bradford R. Jerbic, City Attorney
19 Nevada Bar No. 1056
20 Philip R. Byrnes, Snr. Litigation Counsel
21 Nevada Bar No. 166
22 495 South Main Street, 6th floor
23 Las Vegas, NV 89101
24 *Attorneys for Defendant
25 City of Las Vegas and City of Las Vegas
26 Individual Defendants*

23 **ORDER**

24 IT IS SO ORDERED.

25 Dated this 4th day of September, 2017.

26 

27 RICHARD F. BOULWARE, II
28 United States District Judge